

EXHIBIT 1



FORDHAM UNIVERSITY - UNIVERSITY ACTION FORM

PURPOSE						
<input type="checkbox"/> New Employee <input type="checkbox"/> Transfer <input type="checkbox"/> Promotion <input type="checkbox"/> Reappointment <input type="checkbox"/> Salary Adjustment <input type="checkbox"/> Title Change						
<input checked="" type="checkbox"/> Leave of Absence <input type="checkbox"/> Exit <input type="checkbox"/> Manual Check <input type="checkbox"/> Other:						
PERSONAL INFORMATION						
Fordham ID No.		Last Name		First Name	MI	Personal Email
		Solomon		Esther		
JOB INFORMATION - NEW HIRES						
Employee Classification		Employee Status	Job Type	Start Date	Service Date	Probation End Date
<input type="checkbox"/> Faculty <input type="checkbox"/> Administrator <input type="checkbox"/> Clerical <input type="checkbox"/> Maintenance <input type="checkbox"/> Casual/Hourly		<input type="checkbox"/> Full Time <input type="checkbox"/> Part Time	<input type="checkbox"/> 12 Month <input type="checkbox"/> 10 Month			
		Benefit Status		Position Title/Level		Position No.
		<input type="checkbox"/> Benefits Eligible <input type="checkbox"/> Pension Only <input type="checkbox"/> Non-Benefitted				
HRS	Dept/Location		Annual Salary	Biweekly/Hourly Rate	FOAPL/Budget	
			\$	\$		
Replaced		Anticipated End Date	Supervisor		Timesheet Approver (if different)	
<input type="checkbox"/> TRANSFER <input type="checkbox"/> PROMOTION <input type="checkbox"/> REAPPOINTMENT						
FOAPL Budget				Reappt/Grant End Date		
Current Title/Level		Position No.	Annual Salary	HRS	Biweekly/Hourly Rate	Department
			\$		\$	
New Title/Level		Position No.	Annual Salary	HRS	Biweekly/Hourly Rate	Department
			\$		\$	
LEAVES						
<input checked="" type="checkbox"/> Start Date: 01/01/19 <input type="checkbox"/> End Date:						
<input type="checkbox"/> Short Term Disability <input type="checkbox"/> FMLA <input type="checkbox"/> LTD <input type="checkbox"/> Worker's Comp <input checked="" type="checkbox"/> Personal Leave						
Salary: <input type="checkbox"/> Continue <input checked="" type="checkbox"/> End <input type="checkbox"/> STD Statutory <input type="checkbox"/> Pension Only <input type="checkbox"/> None AS of 4/17/19						
Benefits: <input type="checkbox"/> All <input type="checkbox"/> Medical Only <input type="checkbox"/> Pension Only <input type="checkbox"/> None						
Faculty Leave Type: <input type="checkbox"/> Research <input type="checkbox"/> Fellowship Length: <input type="checkbox"/> Academic Year <input type="checkbox"/> Calendar Year <input checked="" type="checkbox"/> Semester						
Year: 2019 Semester: Spring						
Salary: <input type="checkbox"/> Continue PCT/AMT: <input checked="" type="checkbox"/> End						
Benefits: <input type="checkbox"/> All <input type="checkbox"/> Medical Only <input type="checkbox"/> Pension Only <input type="checkbox"/> None						
EXIT						
Effective Date		Exit Reason		Vacation Days		<input type="checkbox"/> Eligible for Rehire
						<input type="checkbox"/> Not Eligible for Rehire
ADDITIONAL INFORMATION/COMMENTS						
see emails						
HRIS USE ONLY						
Processed for Payroll	Retroactive Days Paid	Retroactive Payment	Vacation Payout	Longevity Added	Salary Deferral	
		\$	\$	\$	\$	
Automatic Benefits/Deduction Setup		<input type="checkbox"/> LTD	<input type="checkbox"/> Basic Life/AD&D	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> Union Fees	<input type="checkbox"/> Union Dues
Effective Date(s)						
Amount(s)		\$	\$	\$	\$	\$
APPROVAL SIGNATURES						
Area VP/Department Manager: R. Velazquez				Date:	7/31/19	
Human Resources:				Date:		
HRIS:				Date:		



FORDHAM UNIVERSITY - UNIVERSITY ACTION FORM

W/out benefits as of 9/1/2021

PURPOSE						
<input type="checkbox"/> New Employee	<input type="checkbox"/> Transfer	<input type="checkbox"/> Promotion	<input type="checkbox"/> Reappointment	<input type="checkbox"/> Salary Adjustment	<input type="checkbox"/> Title Change	
<input checked="" type="checkbox"/> Leave of Absence	<input type="checkbox"/> Exit	<input type="checkbox"/> Manual Check	<input type="checkbox"/> Other:			
PERSONAL INFORMATION						
Fordham ID No.	Last Name	First Name	MI	Personal Email		
	Solomon	Esther				
JOB INFORMATION - NEW HIRES						
Employee Classification	Employee Status	Job Type	Start Date	Service Date	Probation End Date	
<input type="checkbox"/> Faculty	<input type="checkbox"/> Full Time	<input type="checkbox"/> 12 Month				
<input type="checkbox"/> Administrator	<input type="checkbox"/> Part Time	<input type="checkbox"/> 10 Month				
<input type="checkbox"/> Clerical	Benefit Status		Position Title/Level		Position No.	
<input type="checkbox"/> Maintenance	<input type="checkbox"/> Benefits Eligible <input type="checkbox"/> Pension Only					
<input type="checkbox"/> Casual/Hourly	<input type="checkbox"/> Non-Benefitted					
HRS	Dept/Location	Annual Salary	Biweekly/Hourly Rate	FOAPL/Budget		
		\$	\$			
Replaced	Anticipated End Date	Supervisor	Timesheet Approver (if different)			
<input type="checkbox"/> TRANSFER <input type="checkbox"/> PROMOTION <input type="checkbox"/> REAPPOINTMENT						
FOAPL Budget			Reappt/Grant End Date			
Current Title/Level	Position No.	Annual Salary	HRS	Biweekly/Hourly Rate	Department	End Date
		\$		\$		
New Title/Level	Position No.	Annual Salary	HRS	Biweekly/Hourly Rate	Department	Start Date
		\$		\$		
LEAVES						
<input checked="" type="checkbox"/> Start Date: 02/01/2020			<input type="checkbox"/> End Date:			
<input type="checkbox"/> Short Term Disability <input type="checkbox"/> FMLA <input type="checkbox"/> LTD <input type="checkbox"/> Worker's Comp <input checked="" type="checkbox"/> Personal Leave						
Salary: <input type="checkbox"/> Continue <input checked="" type="checkbox"/> End <input type="checkbox"/> STD Statutory						
Benefits: <input type="checkbox"/> All <input type="checkbox"/> Medical Only <input type="checkbox"/> Pension Only <input checked="" type="checkbox"/> None						
Faculty Leave Type: <input type="checkbox"/> Research <input type="checkbox"/> Fellowship Length: <input type="checkbox"/> Academic Year <input type="checkbox"/> Calendar Year <input type="checkbox"/> Semester						
Year: _____ Semester: _____						
Salary: <input type="checkbox"/> Continue <input type="checkbox"/> PCT/AMT: _____ <input type="checkbox"/> End						
Benefits: <input type="checkbox"/> All <input type="checkbox"/> Medical Only <input type="checkbox"/> Pension Only <input type="checkbox"/> None						
EXIT						
Effective Date	Exit Reason	Vacation Days	<input type="checkbox"/> Eligible for Rehire			
			<input type="checkbox"/> Not Eligible for Rehire			
ADDITIONAL INFORMATION/COMMENTS						
HRIS USE ONLY						
Processed for Payroll	Retroactive Days Paid	Retroactive Payment	Vacation Payout	Longevity Added	Salary Deferral	
		\$	\$	\$	\$	
Automatic Benefits/Deduction Setup	<input type="checkbox"/> LTD	<input type="checkbox"/> Basic Life/AD&D	<input type="checkbox"/> Health & Welfare	<input type="checkbox"/> Union Fees	<input type="checkbox"/> Union Dues	
Effective Date(s)						
Amount(s)	\$	\$	\$	\$	\$	
APPROVAL SIGNATURES						
Area VP/Department Manager:	R. Velazquez			Date:	01/31/2020	
Human Resources:				Date:		
HRIS:				Date:	2/3/20	

EXHIBIT 2

CONFIDENTIAL

Solomon v. Fordham University
18-cv-04615-ER

Professor 1

- Male
- Date of Birth: XX/XX/1970
- Title: Associate Professor

Professor 2

- Male
- Date of Birth: XX/XX/1950
- Title: Professor

Professor 3

- Male
- Date of Birth: XX/XX/1952
- Title: Professor

Professor 4

- Male
- Date of Birth: XX/XX/1973
- Title: Associate Professor

Professor 5

- Male
- Date of Birth: XX/XX/1956
- Title: Professor

Professor 6

- Male
- Date of Birth: XX/XX/1943
- Title: Professor

Professor 7

- Male
- Date of Birth: XX/XX/1949
- Title: Professor

Professor 8

- Male
- Date of Birth: XX/XX/1935
- Title: Professor-Phased Retirement

Professor 9

- Male

CONFIDENTIAL

Solomon v. Fordham University
18-cv-04615-ER

- Date of Birth: XX/XX/1980
- Title: Assistant Professor

Professor 10

- Female
- Date of Birth: XX/XX/1973
- Title: Professor

Professor 11

- Female
- Date of Birth: XX/XX/1981
- Title: Associate Professor

Professor 12

- Female
- Date of Birth: XX/XX/1961
- Title: Professor

Professor 13

- Male
- Date of Birth: XX/XX/1942
- Title: Professor- Retired

Professor 14

- Male
- Date of Birth: XX/XX/1948
- Title: Professor

Professor 15

- Male
- Date of Birth: XX/XX/1949
- Title: Professor

EXHIBIT 3

objects to this request as it seeks information outside the scope permitted by Rule 34 of the Federal Rules of Civil Procedure.

3. Salary and Equity

All documents and data: a) provided to the Salary and Benefits Task Force on Indicators of Gender Salary Equity Among Faculty in connection with the 2008 Report of the Salary and Benefits Task Force on Indicators of Gender Salary Equity Among Faculty

b) provide equivalent data for faculty from 2008 to present, along with disaggregation by age, gender, religion

c) from any investigations, policies, recommendations, or change in practices resulting from those Task Force findings, including the “Compression” scheme to raise certain salaries.

RESPONSE TO REQUEST NO. 3(a)

Defendant objects to this request insofar as Plaintiff’s request assumes that the requested documents are official documents created by Defendant University. Defendant further refers Plaintiff to the report from the Faculty Task Force previously produced in this action (Bates number FORDHAM0000177-FORDHAM0000185). Subject to and without waiver of the Objections and the specific objection herein, Defendant will produce reasonably available, relevant, non-privileged, responsive documents to the extent that any exist, that are in the possession, custody or control of Defendant which can be obtained by a reasonable search to the extent not already provided. Defendant reserves the right to supplement or otherwise modify Defendant’s response as necessary up to and through the time of trial.

RESPONSE TO REQUEST NO. 3(b)

Defendant objects to this request to the extent it is overbroad, unduly burdensome and oppressive as Plaintiff requests data for “all” Fordham “faculty from 2008 to present.” Defendant further objects to this request to the extent Plaintiff asks Defendant to create or generate documents that are not already in Defendant’s custody or control.

RESPONSE TO REQUEST NO. 3(c)

Defendant objects to this request as the term “Task Force findings” is not properly defined. Subject to and without waiver of the Objections and the specific objection herein, Defendant will produce reasonably available, relevant, non-privileged, responsive documents to the extent that any exist, that are in the possession, custody or control of Defendant which can be obtained by a reasonable search to the extent not already provided. Defendant reserves the right to supplement or otherwise modify Defendant’s response as necessary up to and through the time of trial.

4. Financial

All Documents Related to Faculty Salaries: Provide all documents, including electronic records, that reflect salary information for faculty members from 2000, broken down by gender, religion, age, department, tenure status, and rank. This includes base salaries, bonuses, overtime pay, and other forms of compensation, including those for special programs, administrative assignments, etc.

Statistical Analyses of Wage Disparities: Provide any statistical analyses conducted by or for Fordham that relate to wage disparities among faculty members, including but not limited to analyses by gender, religion, and age.

Methodologies for Setting Salaries and Increases: Provide all documents describing the methodologies, criteria, or policies used for determining initial faculty salaries, salary increases, merit pay, bonuses, and other forms of compensation.

Communications Regarding Wage-Setting Policies: Provide any communications, including emails and memos, regarding the policies or criteria for setting salaries, bonuses, or raises for faculty members. This includes discussions on adjustments, salary reviews, or changes to salary structures.

Job Classifications and Evaluations: Provide documents that outline job classifications, responsibilities, performance evaluation criteria, and the process for evaluating faculty members.

Documentation of Efforts to Correct Wage Disparities: Provide all documents showing efforts by Fordham to correct or address wage disparities among faculty members. This includes studies, reports, action plans, and outcomes of such efforts.

RESPONSE TO REQUEST NO. 4

Defendant objects to this request to the extent it is overbroad, unduly burdensome and oppressive as it seeks “all documents . . . that reflect salary information for faculty members.” Defendant further objects to this request as it is not properly limited in time/or scope as it seeks documents “from 2000.” Defendant further objects to this request to the extent Plaintiff asks

Defendant to create or generate documents that are not already in Defendant's custody or control. Defendant further refers Plaintiff to the policies previously produced in this action for information regarding how faculty salaries are set. (Bates number FORDHAM0000001-FORDHAM0000133). Defendant further refers Plaintiff to the W2 files previously produced in this action which include salary information for Plaintiff and those professors who Plaintiff alleged were comparator professors as defined in Plaintiff's First Set of Requests to Defendant for the Production of Documents (Bates number FORDHAM0000202-FORDHAM0000324, FORDHAM0013624-FORDHAM0013656). To the extent that Plaintiff expanded the scope of alleged "Comparator Professors" in Plaintiff's Second Request for Documents, Defendant objects. Subject to those objections, Defendant will produce reasonably available, relevant, non-privileged, responsive documents to the extent that any exist, that are in the possession, custody or control of Defendant which can be obtained by a reasonable search to the extent not already provided. Defendant reserves the right to supplement or otherwise modify Defendant's response as necessary up to and through the time of trial.

5. **Protected Class Professor Pattern and Practice**
Provide communications, documents, and personnel records for professors in protected classes who allegedly suffered discriminatory practices using methods similar to those used against Plaintiff. These include Profs. Wright, Zelany, Hessel, Gorgantzis, Marks, Yoon, Orsini, Dubrow, Welch, Weiss, and Gautschi. This should include their hiring documents, performance evaluations, disciplinary records, complaints of discrimination by the professors, communications related to employment status changes, and any retirement or termination paperwork.

RESPONSE TO REQUEST NO. 5

Defendant further objects to this request to the extent it seeks documents and information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence insofar as it requests "hiring documents, performance evaluations, disciplinary records, complaints of

EXHIBIT 4

extent not already provided. Defendant reserves the right to supplement or otherwise modify Defendant's response as necessary up to and through the time of trial.

7. COBRA as Customary

In her June 19, 2019 email to Dr. Solomon, with copies to Dean Boron, Provost Crystal, Dean Crooker, Ms. Elaine Crosson, Esq., James Ryan, Esq, and the Fordham President, Dean Rapacciolli, stated:

"It is customary that faculty on unpaid leave continue on the University health insurance plan through participation in COBRA..." (Dkt. 95-2, Exhibit 31, pp. 69-70)

Produce records of all Business school tenured faculty on unpaid or other leave removed from Fordham Health Care and sent to COBRA for health care coverage since 2000. Produce corresponding correspondence with Discovery Benefits, the IRS, and other entities regarding the "customary" use of COBRA for tenured professors on leave. Produce Fordham policies and procedures on the use of COBRA for tenured Fordham Business School professors on leave.

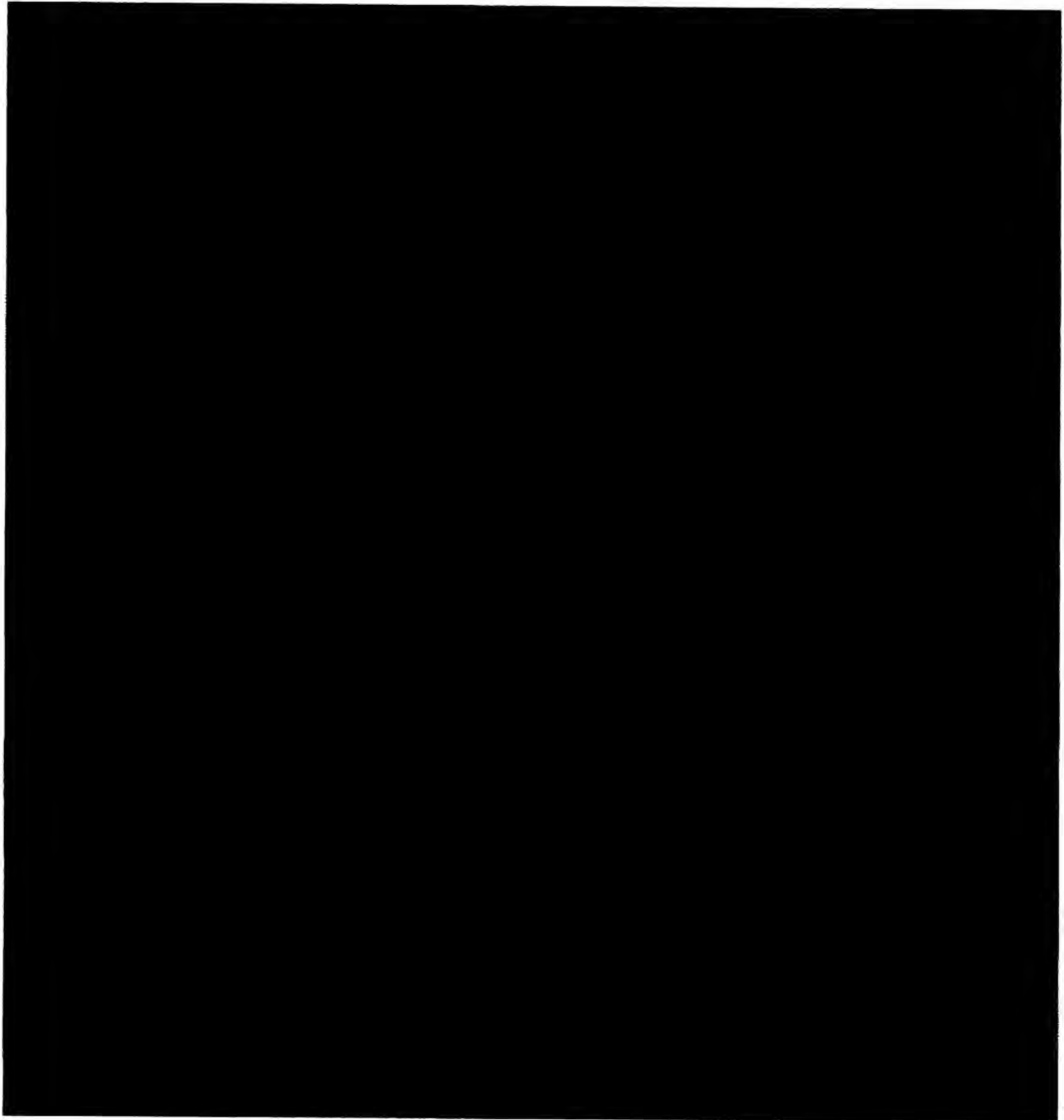
RESPONSE TO REQUEST NO. 7

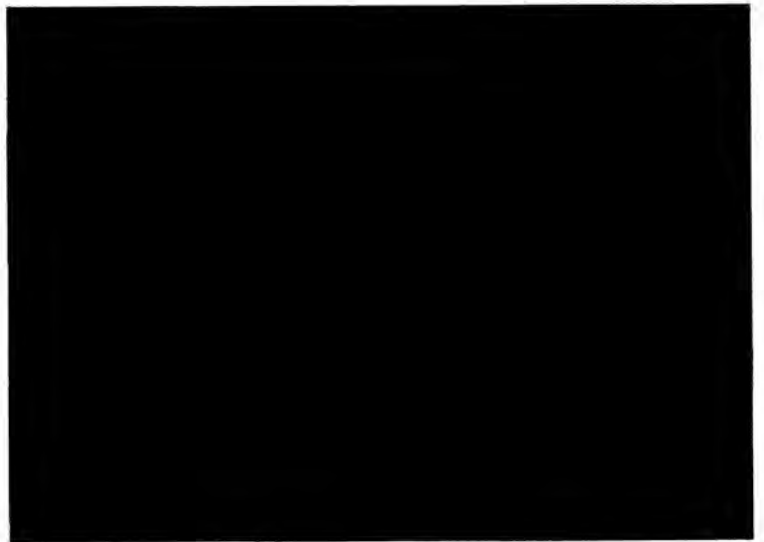
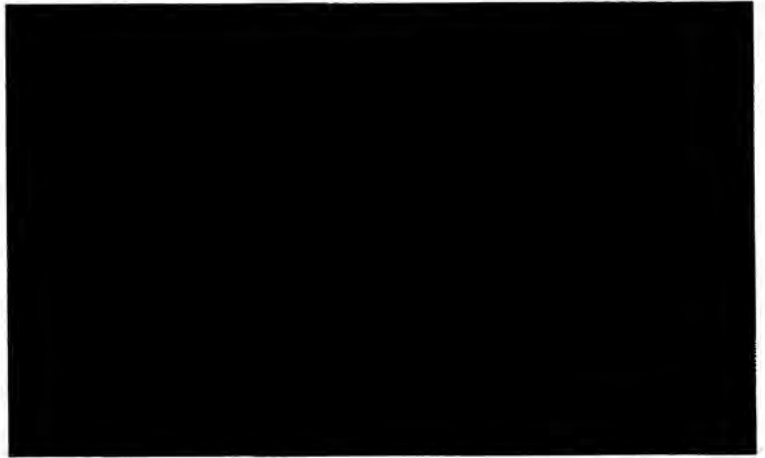
Defendant objects to this request as it is not properly limited in time/or scope and it seeks privileged and confidential employment and health care records of "all" business school tenured faculty members in the form of correspondence reflecting "unpaid or other leave removed from Fordham Health Care and sent to COBRA . . . since 2000." Subject to those objections, Defendant will produce reasonably available, relevant, non-privileged, responsive documents to the extent that any exist, that are in the possession, custody or control of Defendant which can be obtained by a reasonable search to the extent not already provided. Defendant reserves the right to supplement or otherwise modify Defendant's response as necessary up to and through the time of trial.

8. Investigations

Provide documents and communications within Fordham concerning any investigation(s) of the Complaint of Prof. Solomon and the factual allegations or claims at issue in this lawsuit. All documents and communications between and amongst members of the Administration, including but not limited to President Father McShane, Provost Freedman, Dean Rapacciolli, VP Crystal, Dr. Hollwitz, Gabelli Business School faculty members, Fordham undergraduate administrators and faculty, and others so identified in:

EXHIBIT 5





Faculty members from the Unit/School have interviewed the applicant and have been asked to send their recommendations to the Dean: 0001



Q1 - Please sign here:

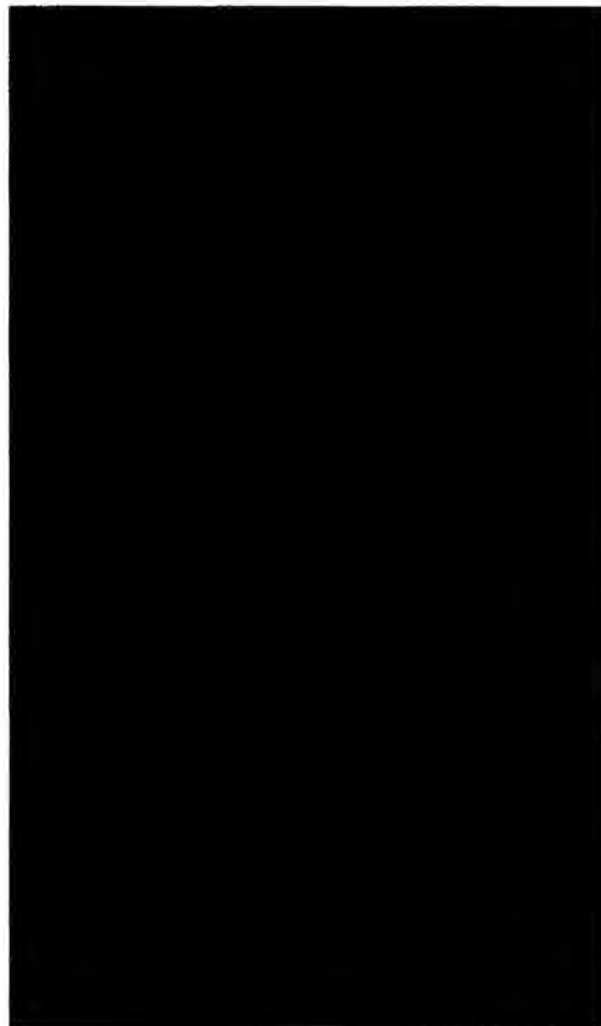
Q1_Id - Id

Image 1

Image 2

Image 3

Image 4



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End of Report

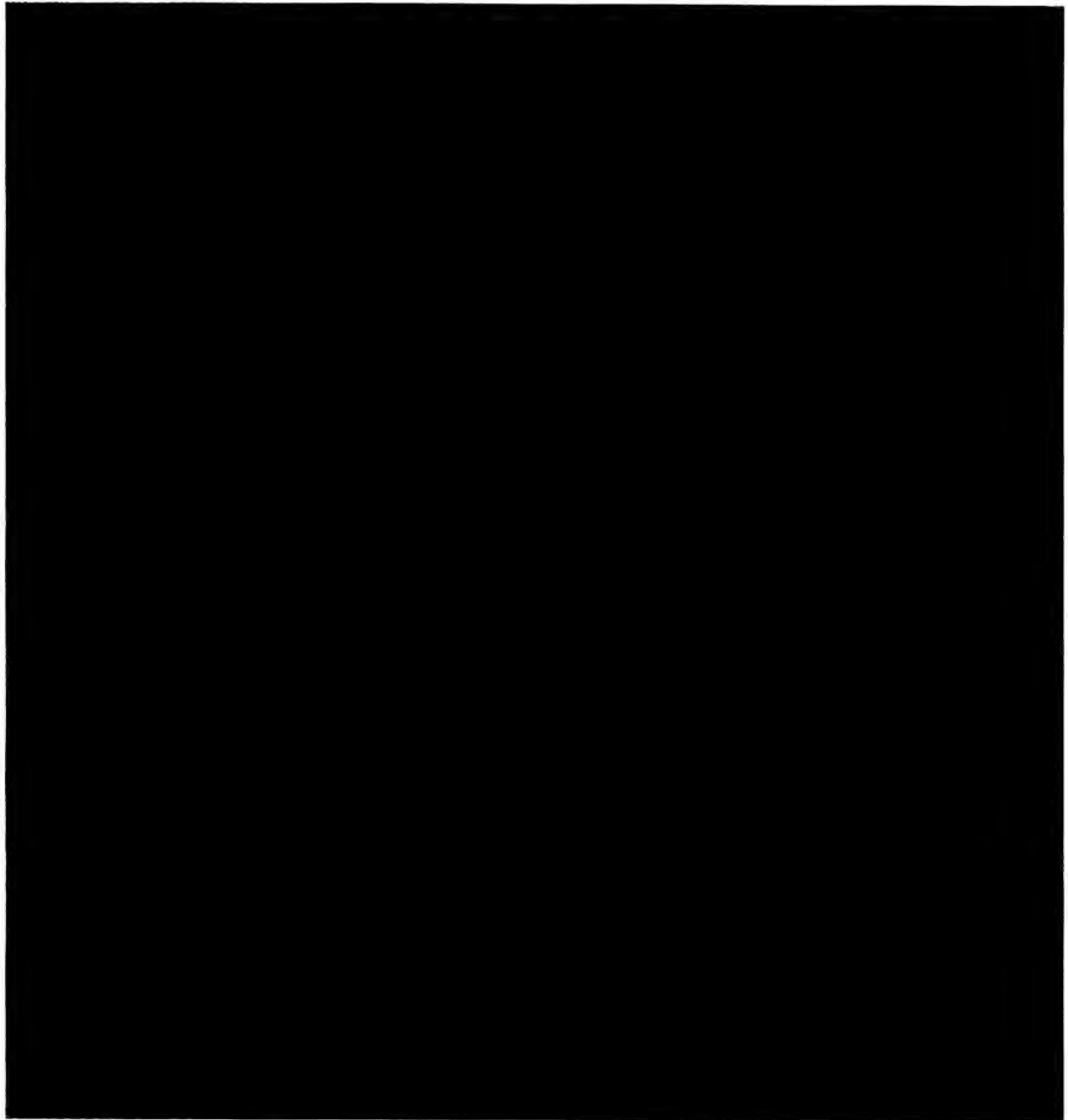
NAME: [REDACTED] - **INFO SYSTEMS**

Application for Promotion - 2018

<u>PRINT NAME</u>	<u>SIGNATURE</u>	<u>DATE</u>	<u>TIME TAKEN</u>	<u>TIME RETURNED</u>				
[REDACTED]								

FORDHAM0015972

CONFIDENTIAL



INTEROFFICE MEMORANDUM

TO: DAVID STUHR
FROM: MAUREEN TIERNEY
SUBJECT: TUTORIAL PAYMENTS
DATE: 9/28/04

As per your request we have saved the tutorial requests of the past several months until we could submit them in bulk. Please make the following tutorial payments charged to budget 246100-1110. Supporting documentation is attached.

[REDACTED]	1 tutorial	Fall 2003
[REDACTED]	1 tutorial	Spring 2004
[REDACTED]	3 tutorials	Summer 2004
[REDACTED]	3 tutorial	Spring 2004
[REDACTED]	1 tutorial	Summer 2004
[REDACTED]	1 tutorial	Summer 2004
[REDACTED]	2 tutorials	Spring 2004
Professor 15	202-52-5879 \$450 1 tutorial	Summer 2004

Approved
L. Stut
3 by

In addition please make the following payments:

[REDACTED] charged to [REDACTED] work on two field studies (one in Spring 2004 and one in Summer 2004).

[REDACTED] work on two field studies in Summer 2004.

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FORDHAM0016315